

# EXHIBIT A

## ALABAMA SJIS CASE DETAIL

PREPARED FOR: CHRISTY MEDLIN



County: 03 Case Number: CV-2022-901518.00  
 Style: JANICE HILL V. TK ELEVATOR CORPORATION

Court Action:

Real Time

## Case

## Case Information

County: 03-MONTGOMERY Case Number: CV-2022-901518.00 Judge: J-H:HON. JOHNNY HARDWICK  
 Style: JANICE HILL V. TK ELEVATOR CORPORATION  
 Filed: 12/07/2022 Case Status: ACTIVE Case Type: NEGLIGENCE-GENERAL  
 Trial Type: JURY Track: Appellate Case: 0  
 No of Plaintiffs: 1 No of Defendants: 1

## Damages

Damage Amt: 0.00 Punitive Damages: 0.00 General Damages: 0.00  
 No Damages: Compensatory Damages: 0.00  
 Pay To: Payment Frequency: Cost Paid By:

## Court Action

Court Action Code: Court Action Desc: Court Action Date:  
 Num of Trial days: 0 Num of Liens: 0 Judgment For:  
 Disposition Date of Appeal: Disposition Judge: : Disposition Type:  
 Revised Judgement Date: Minstral: Appeal Date:  
 Date Trial Began but No Verdict (TBNV1):  
 Date Trial Began but No Verdict (TBNV2):

## Comments

Comment 1:  
 Comment 2:

## Appeal Information

Appeal Date: Appeal Case Number: Appeal Court:  
 Appeal Status: Origin Of Appeal:  
 Appeal To: Appeal To Desc: LowerCourt Appeal Date:  
 Disposition Date Of Appeal: Disposition Type Of Appeal:

## Administrative Information

Transfer to Admin Doc Date: Transfer Reason: Transfer Desc:  
 Number of Subponeas: Last Update: 12/07/2022 Updated By: AJA

## Parties

## Party 1 - Plaintiff INDIVIDUAL - HILL JANICE

## Party Information

Party: C001-Plaintiff Name: HILL JANICE Type: I-INDIVIDUAL  
 Index: D TK ELEVATOR Alt Name: Hardship: No JID: J-H  
 Address 1: 505 20TH ST N Phone: (334) 000-0000

Address 2: SUITE 1700  
 City: BIRMINGHAM State: AL Zip: 35203-0000 Country: US  
 SSN: XXX-XX-X999 DOB: Sex: F Race:

**Court Action**

Court Action: Court Action Date:  
 Amount of Judgement: \$0.00 Court Action For: Exemptions:  
 Cost Against Party: \$0.00 Other Cost: \$0.00 Date Satisfied:  
 Comment: Arrest Date:  
 Warrant Action Date: Warrant Action Status: Status Description:

**Service Information**

Issued: Issued Type: Reissue: Reissue Type:  
 Return: Return Type: Return: Return Type:  
 Served: Service Type Service On: Notice of No Answer:  
 Answer: Answer Type: Notice of No Service: Served By:

**Attorneys**

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	RIL015		RILEY KENNETH EVAN	KRILEY@FRPLEGAL.COM	(205) 324-1212
Attorney 2	ALL108		ALLMON ANASTASIA MICHELLE	AALLMON@FRPLEGAL.COM	(205) 324-1212

**Party 2 - Defendant BUSINESS - TK ELEVATOR CORPORATION****Party Information**

Party: D001-Defendant Name: TK ELEVATOR CORPORATION Type: B-BUSINESS  
 Index: C HILL JANICE All Name: Hardship: No JID: J-H  
 Address 1: C/O CORP SERV CO., INC. Phone: (334) 000-0000  
 Address 2: 641 SOUTH LAWRENCE STREET  
 City: MONTGOMERY State: AL Zip: 36104-0000 Country: US  
 SSN: XXX-XX-X999 DOB: Sex: Race:

**Court Action**

Court Action: Court Action Date:  
 Amount of Judgement: \$0.00 Court Action For: Exemptions:  
 Cost Against Party: \$0.00 Other Cost: \$0.00 Date Satisfied:  
 Comment: Arrest Date:  
 Warrant Action Date: Warrant Action Status: Status Description:

**Service Information**

Issued: 12/07/2022 Issued Type: C-CERTIFIED MAIL Reissue: Reissue Type:  
 Return: Return Type: Return: Return Type:  
 Served: 12/09/2022 Service Type: C-CERTIFIED MAIL Service On: Notice of No Answer:  
 Answer: Answer Type: Notice of No Service: Served By:

**Attorneys**

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	000000		PRO SE		

**Financial**

**Fee Sheet**

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	AOCC	C001	000	\$13.40	\$13.40	\$0.00	\$0.00 0	
ACTIVE	N	CONV	C001	000	\$0.00	\$19.63	\$0.00	\$0.00 0	
ACTIVE	N	CV05	C001	000	\$301.00	\$301.00	\$0.00	\$0.00 0	
ACTIVE	N	JDMD	C001	000	\$100.00	\$100.00	\$0.00	\$0.00 0	
ACTIVE	N	SERV	C001	000	\$30.00	\$30.00	\$0.00	\$0.00 0	
ACTIVE	N	VADM	C001	000	\$45.00	\$45.00	\$0.00	\$0.00 0	
<b>Total:</b>					\$489.40	\$509.03	-\$19.63	\$0.00	

**Financial History**

Transaction Date	Description	Disbursement Account	Transaction Batch	Receipt Number	Amount	From Party	To Party	Money Type	Admin Fee	Reason	Attorney	Operator
12/08/2022	CREDIT	CONV	2023048	156198000	\$19.63	C001	000		N			JAP
12/08/2022	RECEIPT	AOCC	2023048	156197000	\$13.40	C001	000		N			JAP
12/08/2022	RECEIPT	CV05	2023048	156199000	\$301.00	C001	000		N			JAP
12/08/2022	RECEIPT	JDMD	2023048	156200000	\$100.00	C001	000		N			JAP
12/08/2022	RECEIPT	SERV	2023048	156201000	\$30.00	C001	000		N			JAP
12/08/2022	RECEIPT	VADM	2023048	156202000	\$45.00	C001	000		N			JAP

**Case Action Summary**

Date:	Time	Code	Comments	Operator
12/7/2022	5:41 PM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	AJA
12/7/2022	5:41 PM	ASSJ	ASSIGNED TO JUDGE: HON. JOHNNY HARDWICK (AV01)	AJA
12/7/2022	5:41 PM	FILE	FILED THIS DATE: 12/07/2022 (AV01)	AJA
12/7/2022	5:41 PM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	AJA
12/7/2022	5:41 PM	ORIG	ORIGIN: INITIAL FILING (AV01)	AJA
12/7/2022	5:41 PM	TDMJ	JURY TRIAL REQUESTED (AV01)	AJA
12/7/2022	5:41 PM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	AJA
12/7/2022	5:41 PM	C001	C001 PARTY ADDED: HILL JANICE (AV02)	AJA
12/7/2022	5:41 PM	C001	LISTED AS ATTORNEY FOR C001: ALLMON ANASTASIA MIC	AJA
12/7/2022	5:41 PM	C001	C001 E-ORDER FLAG SET TO "Y" (AV02)	AJA
12/7/2022	5:42 PM	C001	INDIGENT FLAG SET TO: N (AV02)	AJA
12/7/2022	5:42 PM	C001	LISTED AS ATTORNEY FOR C001: RILEY KENNETH EVAN	AJA
12/7/2022	5:42 PM	D001	D001 PARTY ADDED: TK ELEVATOR CORPORATION (AV02)	AJA
12/7/2022	5:42 PM	D001	CERTIFIED MAI ISSUED: 12/07/2022 TO D001 (AV02)	AJA
12/7/2022	5:42 PM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	AJA
12/7/2022	5:42 PM	D001	INDIGENT FLAG SET TO: N (AV02)	AJA
12/7/2022	5:42 PM	D001	D001 E-ORDER FLAG SET TO "Y" (AV02)	AJA
12/7/2022	5:42 PM	ECOMP	COMPLAINT E-FILED.	RIL015
12/10/2022	12:21 PM	D001	SERVICE OF CERTIFIED MAI ON 12/09/2022 FOR D001	AJA
12/10/2022	12:22 PM	ESERC	SERVICE RETURN - D001 - COMPLAINT	

**Images**

Date:	Doc#	Title	Description	Pages
12/7/2022 5:42:22 PM	1	CIVIL_COVER_SHEET	CIRCUIT COURT - CIVIL CASE	1
12/7/2022 5:42:22 PM	2	COMPLAINT		5
12/7/2022 5:42:22 PM	3	INTERROGATORIES(R33)	Interrogatories and Requests for Production to Defendant	5
12/7/2022 5:42:33 PM	4	COMPLAINT - TRANSMITTAL	E-NOTICE TRANSMITTALS	2
12/7/2022 5:42:34 PM	5	COMPLAINT - SUMMONS	E-NOTICE TRANSMITTALS	1
12/10/2022 12:22:28 PM	6	SERVICE RETURN	SERVICE RETURN - D001 - COMPLAINT	1
12/10/2022 12:22:33 PM	7	SERVICE RETURN - TRANSMITTAL	E-NOTICE TRANSMITTALS	3



*END OF THE REPORT*



ELECTRONICALLY FILED  
12/7/2022 5:42 PM  
03-CV-2022-901518.00  
CIRCUIT COURT OF  
MONTGOMERY COUNTY, ALABAMA  
GINA J. ISHMAN, CLERK

State of Alabama  
Unified Judicial System  
Form ARCiv-93 Rev. 9/18

**COVER SHEET**  
**CIRCUIT COURT - CIVIL CASE**  
(Not For Domestic Relations Cases)

Ca: 03  
Date of Filing: 12/07/2022  
Judge Code:

**GENERAL INFORMATION**

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA  
JANICE HILL v. TK ELEVATOR CORPORATION

First Plaintiff: ☐ Business ☒ Individual ☐ Government ☐ Other  
First Defendant: ☒ Business ☐ Individual ☐ Government ☐ Other

**NATURE OF SUIT:** Select primary cause of action, by checking box (check only one) that best characterizes your action:

**TORTS: PERSONAL INJURY**

- ☐ WDEA - Wrongful Death  
☒ TONG - Negligence: General  
☐ TOMV - Negligence: Motor Vehicle  
☐ TOWA - Wantonness  
☐ TOPL - Product Liability/AEMLD  
☐ TOMM - Malpractice-Medical  
☐ TOLM - Malpractice-Legal  
☐ TOOM - Malpractice-Other  
☐ TBFM - Fraud/Bad Faith/Misrepresentation  
☐ TOXX - Other: \_\_\_\_\_

**TORTS: PERSONAL INJURY**

- ☐ TOPE - Personal Property  
☐ TORE - Real Property

**OTHER CIVIL FILINGS**

- ☐ ABAN - Abandoned Automobile  
☐ ACCT - Account & Nonmortgage  
☐ APAA - Administrative Agency Appeal  
☐ ADPA - Administrative Procedure Act  
☐ ANPS - Adults in Need of Protective Service

**OTHER CIVIL FILINGS (cont'd)**

- ☐ MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve  
☐ CVRT - Civil Rights  
☐ COND - Condemnation/Eminent Domain/Right-of-Way  
☐ CTMP - Contempt of Court  
☐ CONT - Contract/Ejectment/Writ of Seizure  
☐ TOCN - Conversion  
☐ EQND - Equity Non-Damages Actions/Declaratory Judgment/ Injunction Election Contest/Quiet Title/Sale For Division  
☐ CVUD - Eviction Appeal/Unlawful Detainer  
☐ FORJ - Foreign Judgment  
☐ FORF - Fruits of Crime Forfeiture  
☐ MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition  
☐ PFAB - Protection From Abuse  
☐ EPFA - Elder Protection From Abuse  
☐ QTLB - Quiet Title Land Bank  
☐ FELA - Railroad/Seaman (FELA)  
☐ RPRO - Real Property  
☐ WTEG - Will/Trust/Estate/Guardianship/Conservatorship  
☐ COMP - Workers' Compensation  
☐ CVXX - Miscellaneous Circuit Civil Case

ORIGIN: F ☒ INITIAL FILING

R ☐ REMANDED

A ☐ APPEAL FROM DISTRICT COURT

O ☐ OTHER

T ☐ TRANSFERRED FROM OTHER CIRCUIT COURT

HAS JURY TRIAL BEEN DEMANDED? ☒ YES ☐ NO

Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P. for procedure)

RELIEF REQUESTED: ☒ MONETARY AWARD REQUESTED ☐ NO MONETARY AWARD REQUESTED

ATTORNEY CODE:

RIL015

12/7/2022 5:42:16 PM

Date

/s/ KENNETH E. RILEY

Signature of Attorney/Party filing this form

MEDIATION REQUESTED: ☐ YES ☒ NO ☐ UNDECIDED

Election to Proceed under the Alabama Rules for Expedited Civil Actions: ☐ YES ☒ NO



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12/7/2022 5:42 PM  
03-CV-2022-901518.00  
CIRCUIT COURT OF  
MONTGOMERY COUNTY, ALABAMA  
GINA J. ISHMAN, CLERK

IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

JANICE HILL,

Plaintiff,

v.

Civil Action No.: CV-2022-

TK ELEVATOR CORPORATION, a corporation; there may be other entities whose true names and identities are unknown to the Plaintiff at this time, who may be legally responsible for the claims set forth herein who may be added by amendment by the Plaintiff when their true names and identities are accurately ascertained by further discovery. Until that time, the Plaintiff will designate these parties in accordance with ARCP 9(h). The word "entity" as used herein is intended to refer to and include any and all Legal entities including individual persons, any and all forms of partnership, any and all types of corporations and unincorporated associations. The symbol by which these parties are designated is intended to include more than one entity in the event that discovery reveals that the descriptive characterization of the symbol applies to more than one "entity." In the present action the party Defendants which the Plaintiff must include by descriptive characterization are as follows:

Defendant A, B, and C, that entity on whose behalf the elevator was being operated;  
Defendant D, E, and F, that entity which owned the elevator occupied by Janice Hill;  
Defendant G, H, and I, that entity who controlled the operation of the elevator occupied by Janice Hill;  
Defendant J, K, and L, that entity which entrusted the operation of the elevator occupied by Janice Hill to TK Elevator Corporation;  
Defendant M, N, and O, that entity which maintained the elevator occupied by Janice Hill;  
Defendants P, Q, and R, that entity who designed, manufactured or otherwise marketed the elevator that Janice Hill was occupying at the time of the incident made the subject matter of this lawsuit;  
Defendants S, T, and U, that person, persons, entity or entities who are the predecessor or successor in interest to any of the above-described persons and/or entities;  
Defendants V, W, and X, that person or persons who were involved in the events that caused the Plaintiff's injuries and contributed to such injuries as alleged herein,

Defendants.

COMPLAINT

COMES NOW the Plaintiff, by and through undersigned Counsel, and complains of the Defendants as follows:

1. The Plaintiff, Janice Hill, is over the age of nineteen (19) years and a resident citizen of the State of Alabama.

2. The Defendant, TK Elevator Corporation is an entity incorporated in the State of Delaware and doing business in the State of Alabama.

3. The amount in controversy exceeds the jurisdictional minimums of this Honorable Court.

4. Jurisdiction and venue are proper in this Court.

### **COUNT I**

#### **Negligence/Wantonness**

5. Plaintiff adopts and alleges paragraphs 1 through 4 above as if set out fully herein.

6. On or about December 22, 2020, Plaintiff, Janice Hill, was a business invitee in an elevator managed by Defendant, TK Elevator Corporation, on the premises of RSA Headquarters Building in Montgomery County, Alabama. As the Plaintiff exited the elevator, the elevator malfunctioned and closed on Plaintiff, Janice Hill, causing her to be injured.

7. Plaintiff further alleges that on the said date and at said place, the Defendant and those designated fictitious parties negligently maintained the subject elevator, which the Plaintiff was injured and The Defendants negligently or wantonly failed to insure a safe and hazard-free elevator or the premises where the Plaintiff was injured.

8. The Plaintiff further alleges that the Defendants, whether named or fictitious party Defendants, had a duty to provide a safe, secure and hazard-free elevators for patrons on said premises.

9. The Plaintiff further alleges that the Defendants, whether named or fictitious party Defendants, were negligent or wanton in their maintenance of the subject elevator and that the



Defendants negligence or wantonness rendered said area a hazard and otherwise dangerous condition for individuals, including the Plaintiff. The Defendants failed to warn the Plaintiff of the dangerous or hazardous conditions associated with the malfunctioning elevator.

10. Plaintiff further alleges that the Defendants, whether named or fictitious party Defendants, negligently or wantonly caused and/or allowed an inherently dangerous condition to exist on said premises and failed to warn the Plaintiff or other members of the public about such dangers specifically associated with the subject elevator.

11. The Plaintiff further alleges that as a direct and proximate result of the aforesaid negligent or wanton conduct on the part of the Defendants, whether named or fictitious party Defendants, the Plaintiff, Janice Hill, was proximately caused to suffer the following injuries and damages:

- (a) she was caused to suffer physical pain and mental anguish;
- (b) she was caused to seek medical treatment and was prevented from going about her normal activities;
- (c) she was permanently injured;
- (d) she was caused to incur medical expenses to treat and cure her injuries;
- (e) she was caused to lose wages both past and future; and
- (f) she was caused to be injured and damaged, all to her detriment.

12. Plaintiff avers that on said occasion, the negligence or wantonness of all Defendants, whether named or fictitious parties, combined and concurred to cause the Plaintiff to be injured and damaged as set forth herein.

WHEREFORE, the Plaintiff demands judgment against the Defendants, separately and severally, including fictitious party Defendants, and requests that the jury selected to hear this case render a verdict for the Plaintiff and against each Defendant in the sum in excess of the

jurisdictional limits of this Court which will fairly and adequately compensate the Plaintiff for the above described damages, together with interest from the date of the incident, attorneys' fees, and costs. The Plaintiff further requests that the jury award punitive damages to Plaintiff in an amount which is adequate to reflect the enormity of the Defendants' wrongful acts and which will deter and/or prevent other similar or wrongful acts.

## **COUNT II**

### **Fictitious Defendants**

13. Plaintiff adopts and avers each and every paragraph above as if fully set out herein.

14. Plaintiff further avers that the conduct of Fictitious Defendants, identified as Defendants, "A through X," combined and concurred to directly or proximately cause the Plaintiff's injuries and damages set out in **COUNT I** above. Defendants, "A through X," whose current names and identities are unknown to the Plaintiff at the present time will be correctly named and identified by amendment who properly ascertained.

WHEREFORE, the Plaintiff claims of the Fictitious Defendants, "A through X," damages in an amount in excess of the jurisdictional requirements of this Court, plus costs.

/s/ Kenneth E. Riley

Kenneth E. Riley (RIL015)

Anastasia Riley (ALL108)

Attorneys for Plaintiff

**PLAINTIFF HEREBY DEMANDS A TRIAL BY STRUCK JURY**

/s/ Kenneth E. Riley

Kenneth E. Riley

OF COUNSEL:

FARRIS, RILEY & PITT, LLP  
The Financial Center  
505 20<sup>th</sup> Street North, Suite 1700  
Birmingham, AL 35203  
Phone: (205) 324-1212  
Fax: (205) 324-1255  
[kriley@frplegal.com](mailto:kriley@frplegal.com)  
[ariley@frplegal.com](mailto:ariley@frplegal.com)

**PLEASE SERVE DEFENDANTS BY CERTIFIED MAIL:**

TK Elevator Corporation  
c/o Corporation Service Company, Inc.  
641 South Lawrence Street  
Montgomery, AL 36104



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12/7/2022 5:42 PM

03-CV-2022-901518.00

CIRCUIT COURT OF

MONTGOMERY COUNTY, ALABAMA

GINA J. ISHMAN, CLERK

**IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA**

JANICE HILL,	)	
	)	
Plaintiff,	)	
v.	)	
	)	CASE NO.:
TK ELEVATOR CORPORATION,	)	
	)	
Defendant.	)	

**PLAINTIFF'S FIRST CONTINUING INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT TK ELEVATOR  
CORPORATION**

The Plaintiff, Janice Hill, submits the following Interrogatories and Requests for Production of Documents to Defendant, TK Elevator Corporation, to be answered pursuant to *Alabama Rules of Civil Procedure* 33 and 34.

**INSTRUCTIONS**

1. You are under a duty to reasonably supplement or amend your responses to several of these Interrogatories and Requests as required by Ala. R. Civ. P. 26(e).
2. Each Interrogatory shall be answered separately and fully in writing under oath in accordance with Ala. R. Civ. P. 33(a).
3. All documents or things responsive to a Request set forth herein shall be produced as they are kept in the usual course of business or organized and labeled to correspond with the categories set forth in these requests as required by Ala. R. Civ. P. 34(b).
4. With respect to any documents or things withheld by you due to a claim of privilege or other objection, list for each such document or thing:
  - i. type of document or thing (e.g., memorandum, letter, etc.);
  - ii. author(s);
  - iii. recipient(s);
  - iv. subject matter;
  - v. nature of privilege asserted or other objections;
  - vi. the part of the document withheld; and
  - vii. a description of the thing withheld.
5. If any document or thing requested herein has been destroyed or otherwise disposed of, list for each such document or thing:

- a. type of document or thing (e.g. letter, memorandum, etc.);
- b. author(s)
- c. recipient(s)
- d. the approximate or actual date of the document;
- e. subject matter;
- f. the person who destroyed or otherwise disposed of the document or thing;
- g. in the case of disposition, the person to whom the document or thing was transmitted or to whom a copy was provided;
- h. the date of destruction or disposition; and
- i. the reason for destruction or disposition.

### DEFINITIONS

1. "Person" or "persons" means any individual, corporation, partnership, limited liability company, unincorporated association, or other legal entity or form of organization or association.
2. "You" or "your" means TK Elevator Corporation in this action, its agents, officers, directors, employees, representatives, or other entities acting or purporting to act on its behalf.
3. "And" as well as "or" shall be construed either conjunctively or disjunctively so as to bring within the scope of the Request or Interrogatory any documents or information that might otherwise be construed to be outside its scope.
4. "Communication" means any occurrence whereby facts, opinions, data, or information are transmitted between two or more persons, including, but not limited to, any meeting, conversation, discussion, correspondence, or any other form of oral or written interchange.
5. "Identify" has the following meanings in the following contexts:
  - a. when used with respect to a person, to provide that person's name, date of birth, address, home telephone number, work telephone number, employer, and place of employment;
  - b. when used with respect to a place or location, to provide the address, city, county, and state where that place is located;
  - c. when used with respect to a document or thing, to provide that document's or that thing's current location, author, recipient, subject matter, and date;
  - d. when used with respect to a transaction, occurrence, or act, to set forth the event or events constituting such a transaction, occurrence, or act, the location of the same, and the date and the persons participating in the same.
6. The words "Document" or "Documents" are used to refer to the full scope of documents, writings, and other tangible things discoverable under Ala. R. Civ. P. 34, in whatever form and however and by whomever made. Please note that "document(s)" as so defined include, but are not limited to, any documents or information stored on computer databases, electronic mail,

or otherwise in any retrievable form, as well as every document, writing, or other tangible thing, including without limitation the following items, whether printed, typed, recorded, filmed, stored in a computer format, written, produced by hand or by any other process, and whether original, master, duplicate, or copy: statements; reports; charts; graphs; bills; statements of account; agreements; communications, whether interoffice, intraoffice, or otherwise; correspondence; papers; cablegrams; mailgrams; telegrams; notes, memoranda, summaries, minutes, records, videotapes, sound recordings and transcriptions of telephone conversations, personal conversations, interviews, meetings, conferences, facts, conclusions, impressions, and things similar to the foregoing; books, manuals, publications, and diaries; engineering reports and notebooks; plats; test results; plans; sketches or drawings; photographs; summaries of investigations; surveys; opinions and reports of expert witnesses, appraisers, or consultants; projections; corporate records; minutes of board of directors or committee meetings; desk calendars; appointment books; diaries; diary entries and notes; and any other information-containing paper, writing, or physical thing.

### INTERROGATORIES

1. Please state the name of the person or persons answering or otherwise responding to these Interrogatories on behalf of this Defendant. For each such person, please provide that individual's name, address and relationship to the Defendant. If any such individual is an employee, either current or former, please describe that individual's employment position with this Defendant.

2. Is this Defendant properly named in this lawsuit as TK Elevator Company? If the answer to this Interrogatory is in the negative, please state the correct name of this Defendant.

3. Please state the name and address of each and every individual and/entity that is either a shareholder, partner and/or member of Defendant TK Elevator Company.

4. Please state whether this Defendant or someone acting on this Defendant's behalf has performed any investigation into the allegations of the Complaint made the basis of this suit. If so, please produce the following:

- a. The name of the person or entity conducting the investigation;
- b. Whether any statements were taken pursuant to said investigation;
- c. Any and all photographs or video recordings taken of the scene where this incident occurred;
- d. Any statement taken of the Plaintiff; and
- e. Any investigative report, document or writing of any kind concerning this accident.

5. Please state whether, at the time of this incident, this Defendant had a policy of liability insurance including any umbrella policy or excess coverage. If so, state the following:

- a. the name of the carrier;
- b. the policy number;
- c. the limits of said policy and please include any form of excess coverage.

6. Please state how and when this Defendant was made aware of the incident made the basis of this suit.

7. Please state in great detail this Defendant's understanding of how the incident made basis of this suit occurred.

8. Does this Defendant contend that Plaintiff contributed to cause her injuries? If so, please state in detail each and every way that Plaintiff contributed to cause her injuries.

9. Did anyone representing TK Elevator Company have any conversation before or after the incident with the Plaintiff? If so, please state the substance of the conversation.

10. Does this Defendant contend that a mechanical failure of the subject elevator caused or contributed to cause the incident made the subject matter of this lawsuit? If so, please state specifically this Defendant's contention and specifically name the component that failed.

11. Does this Defendant contend that the subject elevator was improperly maintained which caused or contributed to cause the subject incident? If so, please state the basis for this contention.

12. State the names and addresses of any and all of this Defendant's proposed expert witnesses, and the technical field in which this Defendant claims they are experts. Please also provide the subject matter on which each such expert witness is expected to testify and summarize the substance of the facts and opinions to which any such expert witness expects to testify, including a summary of the grounds for the opinion of each such expert.

13. Please state the name of the entity who serviced the elevator from which the incident occurred.

### **REQUESTS FOR PRODUCTION**

1. Please produce all photographs made in connection with said lawsuit either by this Defendant or on behalf of this Defendant.

2. All applicable insurance policies in force at the time of the incident which is the basis of this lawsuit.

3. A list of each and every exhibit that Defendant, or its attorneys, proposes to use in the trial of this action.

4. A copy of each and every exhibit that Defendant, or its attorneys, proposes to use in the trial of this action.

5. Each and every scientific treatise, book or document or treatise of any authority on

the subject, the issue of the lawsuit, or any authoritative text or document in any way relating, concerning or pertaining to Plaintiff's claims expressed in the Complaint that Defendant intends to use at trial.

6. Submit each article or thing that Defendant intends to offer or use in the trial of this case to demonstrate, illustrate, aid and/or assist in the testimony of any witness.

7. Each and every document or item obtained by this Defendant or on this Defendant's behalf by way of subpoena. This request is ongoing and must be seasonally supplemented as new documents or items are obtained.

8. Please produce any videos or photos which depict the subject elevator.

9. Please produce any incident report concerning the subject incident.

10. Please produce any and all statements of any party or witness concerning the subject incident.

11. Please produce compliance reports/records of the subject elevator from which the incident occurred dating back 3 years.

12. Please produce service and maintenance reports/records of the subject elevator from which the incident occurred dating back 3 years.

13. Please produce any prior incident reports and complaints involving the subject elevator from which the incident occurred dating back 3 years.

/s/ Kenneth E. Riley

Kenneth E. Riley (RIL015)

Anastasia Allmon Riley (ALL108)

Attorneys for Plaintiff

OF COUNSEL:

**FARRIS, RILEY & PITT, L.L.P.**

The Financial Center

505 20<sup>th</sup> Street North, Suite 1700

Birmingham, AL 35203

Telephone: (205) 324-1212

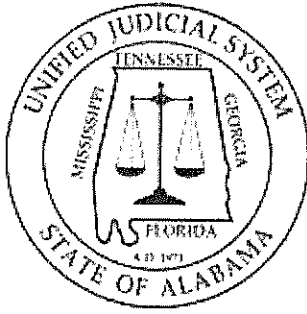
Facsimile: (205) 324-1255

[kriley@frplegal.com](mailto:kriley@frplegal.com)

[ariley@frplegal.com](mailto:ariley@frplegal.com)

**TO CLERK: PLEASE SERVE WITH SUMMONS AND COMPLAINT**





## AlaFile E-Notice

03-CV-2022-901518.00

To: KENNETH E. RILEY  
kriley@frplegal.com

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

JANICE HILL V. TK ELEVATOR CORPORATION  
03-CV-2022-901518.00

The following complaint was FILED on 12/7/2022 5:42:22 PM

Notice Date: 12/7/2022 5:42:22 PM

GINA J. ISHMAN  
CIRCUIT COURT CLERK  
MONTGOMERY COUNTY, ALABAMA  
251 S. LAWRENCE STREET  
MONTGOMERY, AL, 36104

334-832-1260



251 S. LAWRENCE STREET  
MONTGOMERY, AL. 36104

USPS CERTIFIED MAIL



9236 0901 7301 4103 2200 0786 55

03-CV-2022-901518.00

**Restricted Delivery**

To: TK ELEVATOR CORPORATION  
C/O CORP SERV CO., INC.  
641 SOUTH LAWRENCE STREET  
MONTGOMERY, AL 36104

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## NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

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State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	<b>SUMMONS</b> <b>- CIVIL -</b>	<b>Court Case Number</b> 03-CV-2022-901518.00
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**IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA**  
**JANICE HILL V. TK ELEVATOR CORPORATION**

**NOTICE TO:** TK ELEVATOR CORPORATION, C/O CORP SERV CO., INC. 641 SOUTH LAWRENCE STREET, MONTGOMERY, AL 36104  
 \_\_\_\_\_  
*(Name and Address of Defendant)*

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),  
 KENNETH E. RILEY  
 \_\_\_\_\_  
*[Name(s) of Attorney(s)]*

WHOSE ADDRESS(ES) IS/ARE: 505 North 20th St Ste 1700, BIRMINGHAM, AL 35203  
 \_\_\_\_\_  
*[Address(es) of Plaintiff(s) or Attorney(s)]*

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

**TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:**

☐ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☒ Service by certified mail of this Summons is initiated upon the written request of JANICE HILL  
 pursuant to the Alabama Rules of the Civil Procedure. *[Name(s)]*

12/07/2022 /s/ GINA J. ISHMAN By:  
*(Date)* *(Signature of Clerk)* *(Name)*

☒ Certified Mail is hereby requested. /s/ KENNETH E. RILEY  
*(Plaintiff's/Attorney's Signature)*

**RETURN ON SERVICE**

☐ Return receipt of certified mail received in this office on \_\_\_\_\_  
*(Date)*

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to \_\_\_\_\_  
 \_\_\_\_\_ in \_\_\_\_\_ County,  
*(Name of Person Served)* *(Name of County)*

Alabama on \_\_\_\_\_  
*(Date)*

\_\_\_\_\_  
*(Type of Process Server)*

\_\_\_\_\_  
*(Server's Signature)*

\_\_\_\_\_  
*(Address of Server)*

\_\_\_\_\_  
*(Server's Printed Name)*

\_\_\_\_\_  
*(Phone Number of Server)*



December 10, 2022

Dear Circuit Clerk:

**UJS Information**

Case Number: 03-CV-2022-901518.00  
 Document Type: Complaint  
 Restricted Delivery Requested: Yes

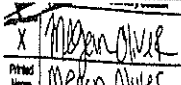
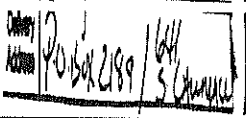
Intended Recipient:  
 TK ELEVATOR CORPORATION (D001)  
 C/O CORP SERV CO., INC.  
 641 SOUTH LAWRENCE STREET  
 MONTGOMERY, AL 36104

The following is in response to your request for proof of delivery on your item with the tracking number:  
**9236 0901 7301 4103 2200 0786 55.**

**Item Details**

**Status:** Delivered, Individual Picked Up at Post Office  
**Status Date / Time:** December 9, 2022, 7:45 am  
**Location:** MONTGOMERY, AL 36104  
**Postal Product:** First-Class Mail®  
**Extra Services:** Certified Mail Restricted Delivery  
 Return Receipt Electronic

**Recipient Signature**

Signature of Recipient:	
Address of Recipient:	

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,  
 United States Postal Service®  
 475 L'Enfant Plaza SW  
 Washington, D.C. 20260-0004



## AlaFile E-Notice

03-CV-2022-901518.00

Judge: HON. JOHNNY HARDWICK

To: RILEY KENNETH EVAN  
kriley@frplegal.com

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## NOTICE OF SERVICE

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IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

JANICE HILL V. TK ELEVATOR CORPORATION  
03-CV-2022-901518.00

The following matter was served on 12/9/2022

**D001 TK ELEVATOR CORPORATION**

**Corresponding To**

**CERTIFIED MAIL**

**ELECTRONIC CERTIFIED MAIL RETURN**

GINA J. ISHMAN  
CIRCUIT COURT CLERK  
MONTGOMERY COUNTY, ALABAMA  
251 S. LAWRENCE STREET  
MONTGOMERY, AL, 36104

334-832-1260



## AlaFile E-Notice

03-CV-2022-901518.00

Judge: HON. JOHNNY HARDWICK

To: ALLMON ANASTASIA MICHELLE  
ariley@frplegal.com

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## NOTICE OF SERVICE

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IN THE CIRCUIT COURT OF MONTGOMERY COUNTY, ALABAMA

JANICE HILL V. TK ELEVATOR CORPORATION  
03-CV-2022-901518.00

The following matter was served on 12/9/2022

**D001 TK ELEVATOR CORPORATION**

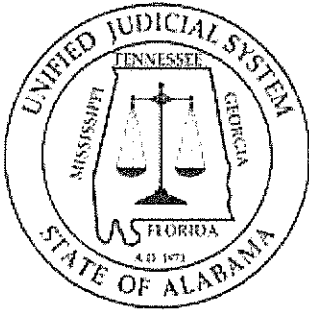
**Corresponding To**

**CERTIFIED MAIL**

**ELECTRONIC CERTIFIED MAIL RETURN**

GINA J. ISHMAN  
CIRCUIT COURT CLERK  
MONTGOMERY COUNTY, ALABAMA  
251 S. LAWRENCE STREET  
MONTGOMERY, AL, 36104

334-832-1260



## AlaFile E-Notice

03-CV-2022-901518.00

Judge: HON. JOHNNY HARDWICK

To: TK ELEVATOR CORPORATION (PRO SE)  
C/O CORP SERV CO., INC.  
641 SOUTH LAWRENCE STREET  
MONTGOMERY, AL, 36104-0000

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